

CLARK HILL, PLC

151 S. Old Woodward Ave., Ste. 200
Birmingham, Michigan 48009
Telephone: (248) 988-1817
Facsimile: (248) 988-2336
David M. Blau (P52542)

*Attorneys for Agree Limited Partnership, Lakewood Shopping
Center, LLC, and Crossroads Centre II, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

_____	x	
	.	Chapter 11
	.	
In re:	.	Case No. 18-23538-rdd
	.	
SEARS HOLDINGS CORPORATION.,	.	
<i>et al.</i> ,	.	(Joint Administration Pending)
	.	
Debtors.	.	
_____	x	

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF
PAPERS AND REQUEST TO BE ADDED TO MASTER SERVICE LIST**

Please take notice that the Attorneys for AGREE LIMITED PARTNERSHIP, LAKEWOOD SHOPPING CENTER, LLC, and CROSSROADS CENTRE II, LLC, hereby enters their appearance by and through their counsel, Clark Hill PLC, pursuant to 11 U.S.C. § 1109(b) and Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and 11 U.S.C. § 342 and 1109(b), that copies of all notices and pleadings given or filed in these cases be given and served upon the party listed at the address and telephone listed below, and that its counsel be added to the Master Service List in this case.

David M. Blau, Esq.
Clark Hill PLC
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Birmingham, MI 48009
Telephone: (248) 988-1817 Facsimile: (248) 988-2336
dblau@clarkhill.com

Please take further notice that, pursuant to 11 U.S.C. § 1109(b), the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint,

demand, motion, petition, pleading or request, whether formal or informal, written, or oral, and whether transmitter or conveyed by mail, delivery, telephone, telegraph, telex, e-mail or otherwise filed or made with regard to the referenced cases and proceedings herein.

This Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the Creditors': (i) right to have final orders in non-core matters entered only after de novo review by a district court judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which the Landlords are or may be entitled under agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments expressly are hereby reserved.

Dated: October 15, 2018 Respectfully submitted,

CLARK HILL, PLC

/s/ David M. Blau

David M. Blau (MI P52542) (Admission pro hac vice pending)

151 S. Old Woodward Ave., Ste. 2000

Birmingham, MI 48009

Tel. (248) 988-1817

Fax. (248) 988-2336

Attorneys for Attorneys for Agree Limited

Partnership, Lakewood Shopping Center, LLC,

and Crossroads Centre II, LLC

dblau@clarkhill.com

CERTIFICATE OF SERVICE

I do hereby certify that I caused to be served a true copy of the *Notice of Appearance and Request for Service of Papers and Request to be Added to Master Service List* upon all counsel of record via the Court's ECF filing system.

Dated: October 15, 2018

CLARK HILL, PLC

/s/ David M. Blau

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